NOVEMBER 10, 1983

BACKGROUND AND STATUS REPORT
CYANIDE CONTAMINATED FILM CHIP SITES IN NORTHERN ILLINOIS

Sixteen million pounds of cyanide contaminated photographic film chips have been illegally disposed of at six sites in the Chicago area and in two warehouses near Dixon, Illinois.

In July 1980, Film Recovery Systems, Inc. (FRS) began recovering silver from scrap x-ray film at its facility located in Elk Grove Village, Illinois. The company used a cyanide mixture in the silver recovery process. On February 10, 1983, an FRS employee died at the facility. The Cook County Coroner's office determined that the cause of death was cyanide poisoning. FRS shut down its operation in March 1983.

On April 4, 1983, the Illinois Attorney General (IAG) received an anonymous call regarding the trailers located at the Gemini Leasing Company in Hodgkins, Illinois. Subsequent investigations by the IEPA and IAG revealed approximately 170 semi-trailers containing 6 million pounds of cyanide contaminated film chips located at nine sites in the Chicago area. In addition, IEPA and the IAG discovered two warehouses at the Green River Industrial Park near Dixon, Illinois which contain approximately 10 million pounds of contaminated chips. Laboratory results showed the film to contain on average 400 parts per million (ppm) total cyanide.

The IAG on behalf of the IEPA filed a civil complaint in Cook County Circuit Court on May 12, 1983 against FRS for violations of the Illinois Environmental Protection Act. On May 25, 1983, the IAG and FRS entered into an agreed order which stipulated that PetroChem Services, Inc., a private contractor, be retained to detoxify the film chips at the six Chicago area sites and the Dixon site. The defendants established a trust fund of $250,000 to pay for the cleanup. As of August 1, 1983, PetroChem had detoxified 1.5 million pounds of film chips at the Alden Warehouse site in Chicago; however, the IAG had no additional funds for cleanup and PetroChem stopped work. The detoxified film chips are still at the Alden site and approximately 14 million pounds of contaminated film remain to be detoxified.

In August 1983, the IEPA discovered the trailers leaking at all six sites and hired a private contractor to repair the leaks. The contractor completed the repair work on September 1, 1983. IEPA reinspected the sites on September 6, 1983 after a heavy rainfall and found some trailers still leaking. On September 19, 1983, IEPA requested USEPA to initiate an immediate removal action under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA, commonly known as Superfund) at the Chicago and Dixon sites. USEPA inspected the six Chicago areas sites on September 19, 1983, and the Dixon site on September 26, 1983, and

determined that an immediate action was not warranted at that time. In an October 3, 1983, letter to IEPA, USEPA agreed to prepare a request to USEPA Headquarters for a planned removal action at the Chicago area and Dixon sites.

On October 6, 1983, USEPA received information from the Metropolitan Sanitary District of Greater Chicago (MSDGC) that samples taken during a heavy rainstorm revealed runoff containing 1.03 ppm of total cyanide entering a storm ditch at the Summit site and 15.2 ppm of total cyanide entering a storm sewer at the McCook site. These discharges are in violation of MSDGC's 0.1 ppm limit for discharge of cyanide into waterways. At the request of USEPA, the Illinois State Police inventoried the six sites on October 14 and 17, 1983 to determine the condition of the trailers. That inventory revealed that most of the trailers were leaking. Based on the information from MSDGC and the Illinois State Police, USEPA has determined that an immediate action is warranted at this time.

In September, USEPA began analyzing alternatives to identify a safe ultimate disposal method for the film chips. USEPA, IEPA and the IAG plan to conduct a test burn at a pilot plant incinerator to determine the feasibility of incinerating the film chips. Also, a USEPA contractor is conducting experiments to determine the feasibility of treating the film chips. We expect the results of both of those studies to be available in January.